



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

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Greenbelt, Maryland 20770  
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October 15, 2013

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2013 ETC Annual Report of Tri-County Telephone Association, Inc. and TCT  
West Inc.  
Study Area Code 512296**

Dear Ms. Dortch:

On behalf of Tri-County Telephone Association, Inc. and TCT West Inc. “Tri-County and TCT”, JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Tri-County and TCT seek confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010> Study Area Code	512296
<015> Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Steven C. Harper
<035> Contact Telephone Number: Number of the person identified in data line <030>	307-568-2427
<039> Contact Email Address: Email of the person identified in data line <030>	steve.harper@tctstaff.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting <span style="float: right;">(complete attached worksheet)</span>	(check box when complete)	
<200> Outage Reporting (voice) <span style="float: right;">(complete attached worksheet)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		
<300> Unfulfilled Service Requests (voice)	<input checked="" type="checkbox"/>	
<310> Detail on Attempts (voice) <span style="float: right;">(attach descriptive document)</span>		
<320> Unfulfilled Service Requests (broadband)		
<330> Detail on Attempts (broadband) <span style="float: right;">(attach descriptive document)</span>		
<400> Number of Complaints per 1,000 customers (voice)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed <span style="float: right;">0.0</span>		
<420> Mobile		
<430> Number of Complaints per 1,000 customers (broadband)		
<440> Fixed		
<450> Mobile		
<500> Service Quality Standards & Consumer Protection Rules Compliance <span style="float: right;">(check to indicate certification)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 512296wy510 <span style="float: right;">(attached descriptive document)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations <span style="float: right;">(check to indicate certification)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 512296wy610 <span style="float: right;">(attached descriptive document)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice) <span style="float: right;">(complete attached worksheet)</span>		
<710> Company Price Offerings (broadband) <span style="float: right;">(complete attached worksheet)</span>		
<800> Operating Companies and Affiliates <span style="float: right;">(complete attached worksheet)</span>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <span style="float: right;">(if yes, complete attached worksheet)</span>	<input checked="" type="checkbox"/>	
<1000> Voice Services Rate Comparability <span style="float: right;">(check to indicate certification)</span>		
<1010> <span style="float: right;">(attach descriptive document)</span>		
<1100> Terrestrial Backhaul (Y/N)? <span style="float: right;">(if not, check to indicate certification)</span>		
<1110> <span style="float: right;">(complete attached worksheet)</span>		
<1200> Terms and Condition for Lifeline Customers <span style="float: right;">(complete attached worksheet)</span>		<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)		
<2005>	(complete attached worksheet)		

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	512296
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<035>	Contact Telephone Number - Number of person identified in data line <030>	307-568-2427
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no ) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no ) <input type="radio"/> <input checked="" type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

\_\_\_\_\_  
Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2013
<702>	Single State-wide Residential Local Service Charge	

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	512296
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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	307-568-2427
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com
<810>	Reporting Carrier	Tri County Telephone Association, Inc.
<811>	Holding Company	
<812>	Operating Company	TCT

[illegible]

<b>(900) Tribal Lands Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<910> Tribal Land(s) on which ETC Serves Wind River Reservation

<920> Tribal Government Engagement Obligation

512296WY920

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes



<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	512296wy1210 <hr/> Name of attached document (.pdf)
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<1220> Link to Public Website	HTTP <hr/>
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“Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222> Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223> Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

**(2000) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

**CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.**

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}


**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification


**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

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**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.
- <2021> Interim Progress Community Anchor Institutions


Name of Attached Document Listing Required Information

\_\_\_\_\_

**(3000) Rate Of Return Carrier Additional Documentation**

**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

**Progress Report on 5 Year Plan**

<p>(3010) Milestone Certification {47 CFR § 54.313(f)(1)(i)} Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.</p>	<p>Name of Attached Document Listing Required Information</p>	<input type="checkbox"/>
<p>(3012) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} (3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (3014) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) (3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>	<p>Name of Attached Document Listing Required Information</p>	<input checked="" type="checkbox"/> (Yes/No) <input checked="" type="checkbox"/> (Yes/No)  <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<p>(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation (3018) If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications (3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, (3022) Underlying information subjected to a review by an independent certified public accountant (3023) Underlying information subjected to an officer certification. (3024) PDF of Balance Sheet, Income Statement and Statement of Cash Flows (3025) Attach the worksheet listing required information</p>	<p>Name of Attached Document Listing Required Information</p>	<p>512296WY3017</p> <input type="checkbox"/> (Yes/No)  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <p>No Document Attached</p>

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039> Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
Signature of Authorized Officer:	CERTIFIED ONLINE
Date	10/14/2013
Printed name of Authorized Officer:	Chris Davidson
Title or position of Authorized Officer:	CEO
Telephone number of Authorized Officer:	307-568-2427
Study Area Code of Reporting Carrier:	512296
Filing Due Date for this form:	10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	512296
<015> Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
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<039> Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<b>(800) Operating Companies</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com
<810>	Reporting Carrier	Tri County Telephone Association, Inc.
<811>	Holding Company	
<812>	Operating Company	TCT

[illegible]



**Certification for Tri County Telephone Association, Inc and TCT WEST, Inc.**

**1. Demonstration of complying with applicable service quality standards and consumer protection rules:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

**Tri County Telephone Association, Inc. and TCT WEST, Inc.** (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of **the Wyoming PSC** which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

adherence to extensive quality of service reporting rules including held orders, repetitive repair visits, complaints per 1,000 customer reporting, network testing processes. In addition the company adheres to, service outage reporting rules, immediate complaint resolution standards, federal “cramming” requirements, emergency service preparedness standards, including generator and battery backup, traffic re-routing and spike management rules “C.F.R. §54.202(a)(2), and 911 redundancy standards. (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers’ privacy.

**Certification for Tri County Telephone Association, Inc. and TCT WEST, Inc.****Ability to Function in Emergency Situations**

The Company hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).<sup>1</sup> The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to the appropriate fuel.

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<sup>1</sup> Section 54.201(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

## **THE PROVISION OF SERVICE ON TRIBAL LANDS TRIBAL GOVERNMENT ENGAGEMENT OBLIGATIONS**

Tri county Telephone Association, Inc. (TCT) provides telecommunications services on a small portion of the Wind River Reservation. By far, the greatest portion of the Reservation lies south of the Owl Creek Mountains; however, a small part of the Reservation lies north of the Mountains and TCT's Hamilton Dome exchange crosses a small section of the latter northern area. Further, in 1910, the area served by TCT was opened for homesteading through issuance of land patents by the federal government further reducing the extent of Reservation land.

The remaining Native American enterprise is the Arapahoe Ranch containing ranch offices and three residences all of which are served by private line (special access) provided by CenturyLink from tribal headquarters in Fort Washakie, Wyoming. TCT provides the terminating link for the circuit.

TCT regularly conducts house-to-house surveys in the area in search of newly arrived Native American members of the Eastern Shoshone and Northern Arapahoe tribes. The intent is to provide service and to assist with the telecommunications benefits provided by the federal government through programs offered by the Federal Communications Commission. The most recent survey was conducted early in 2013 and, as with previous surveys, no Native Americans were located. As a consequence, TCT does not serve any Native Americans, except as noted above (the special access end link to the Arapahoe Ranch).

TCT takes the obligation to serve this part of the Reservation seriously and will continue surveys in the area to ensure service is offered when newly arrived Native Americans are located.

In terms of needs assessment and deployment planning, there are no Tribal community anchor institutions located in this area of the reservation. Further, there has been no requirement for feasibility and sustainability planning because TCT has placed high capacity fiber optic cable to within a very short distance of every location within the area providing high bandwidth service availability to everyone. The capability of the fiber is such that the existing level of service as well as future demand will be available to all residing or conducting business in the area.

Because Tribal Headquarters lie outside the TCT service territory and there are no anchor institutions located in the area, TCT has not needed to market enterprise services; however all employees are aware of our service obligations to Native Americans and if and when telecommunications services are needed, they are prepared to be culturally sensitive.

TCT has obtained permission from the Bureau of Indian Affairs to place cable along the road rights-of-way in the area and will continue to do so when required. The same applies to meeting all Land Use requirements and Environmental Review processes when and wherever required. TCT provides fiber service in this area and does not now nor does it plan to provide wireless service; accordingly, Facilities Siting rules do not apply.

TCT subscribes to the Department of the Interior website and to local publications to remain aware of all matters affecting tribal culture as well as events TCT can attend to remain aware of Reservation life and the culture of its Native American neighbors.

Even through the provision of service by TCT is limited, the Company is aware of its obligations and will continue its outreach to ensure compliance with all requirements and its continuing commitment to the provision of high quality telecommunication services in the area to all existing and future residents and enterprises.

## Lifeline Telephone Assistance Program

The Telephone Assistance Program (TAP), also known as Lifeline, is a program to help provide eligible recipients a single residential telephone at their primary residence. The program offers a monthly discount on local telephone service. Tribal Lifeline support is also available for qualifying low-income individuals living on reservations as defined by the Bureau of Indian Affairs (BIA) regulations.

TCT works with the Wyoming Department of Family Services to assist individuals in qualifying for the program. If interested, please contact your local Department of Family Services field office or TCT at 1.800.354.2911.

*El Programa de Asistencia Telefónica (TAP), también conocido como Lifeline, es un programa para ayudar a proporcionar a los beneficiarios elegibles un teléfono residencial único en su residencia principal. El programa ofrece un descuento mensual en servicio telefónico local. Asistencia de Lifeline tribales también está disponible para la calificación de personas de bajos ingresos que viven en las reservas según lo definido por la Oficina de Asuntos Indígenas (BIA) los reglamentos.*

*TCT trabaja con el Departamento de Servicios Familiares de Wyoming para asistir a individuos en la calificación para el programa. Si está interesado, póngase en contacto con su oficina local del Departamento de Servicios Familiares de campo o de TCT en el 1.800.354.2911.*

**Basin**  
405 S 4th St.  
307.568.3357

**Cody**  
1601 S. Park Dr.  
307.586.3800

**Lovell**  
451 Shoshone Ave.  
307.548.2275

**Powell**  
401 S. Bent St. #4  
307.754.9160



**800.354.2911 tctwest.net**

**Are you in need  
of telephone  
service but worried  
about the cost?**

## Lifeline Telephone Assistance Program

**Learn how it  
can work for you.**



## *How do I qualify for this assistance program?*

You may be qualified if your household income is no more than 135 percent of the federal poverty income guidelines or if you participate in any of the following programs:

- Medicaid
- Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
- Supplemental Security Income (SSI)
- Federal Public House Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance to Needy Families (TANF)
- Nat'l School Lunch Program's Free Lunch Program
- Bureau of Indian Affairs General Assistance
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Head Start (if income eligibility criteria are met)
- State assistance programs (if applicable).

Federal rules prohibit eligible low-income consumers from receiving more than one Lifeline discount per household. An eligible consumer may receive a discount on either a wireline or wireless service, but not both. A consumer whose household currently is receiving more than one Lifeline service must select a single Lifeline provider and contact the other provider to de-enroll from their program. Consumers violating this rule may also be subject to criminal and/or civil penalties.

## *How do I apply?*

Customers interested in the program must first qualify by participating in one of the public assistance programs listed in this brochure and then fill out an application for Lifeline. Customers who already participate in one of the programs listed on the previous page should contact a Wyoming Department of Family Services ("DFS") field office in Greybull, Cody, or Powell for an application, and to verify certain DFS identification information. Using information that DFS has about your participation in qualifying assistance programs, DFS will assist you with a Lifeline application. Applications are also available on the TCT website. DFS and TCT will work together to certify you for each of these programs.

## *Are there other ways I can reduce my telephone bill?*

TCT offers toll limitation service, which can block incoming and outgoing toll telephone calls to help consumers limit their monthly per-call fees.

In addition, TCT offers selective call rejection and a variety of long distance calling plans which, while offered for a fee, may further reduce your phone bill.

## *Additional assistance available to residents of tribal lands*

If you live on or even near tribal lands such as the Wind River Reservation, you may be eligible for additional assistance through enhanced Lifeline programs.

## *Want to learn more?*

To learn more about this program or to find out if you qualify, contact TCT at 1.800.354.2911, your local DFS office, the Wyoming Public Service Commission at 1.307.777.7427, or the Federal Communications Commission at 1.888.CALL.FCC. You may also visit the following websites: [lifelinesupport.org](http://lifelinesupport.org) [tctwest.net](http://tctwest.net)



**800.354.2911 [tctwest.net](http://tctwest.net)**

**REDACTED – FOR PUBLIC INSPECTION**

**TRI COUNTY TELEPHONE ASSOCIATION, INC. AND TCT WEST, INC. (SAC 512296)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**